

AB/ANR

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
-----X

UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(18 U.S.C. § 1544)

MORRIS JABATEH,

22-MJ- 1202

Defendant.

-----X

EASTERN DISTRICT OF NEW YORK, SS:

ALISON PIERCE, being duly sworn, deposes and states that she is a Special Agent with the United States Department of State, duly appointed according to law and acting as such.

On or about November 4, 2022, within the Eastern District of New York and elsewhere, the defendant MORRIS JABATEH willfully and knowingly used a passport issued or designed for the use of another.

(Title 18, United States Code, Section 1544)

The source of your deponent's information and the grounds for her belief are as follows:¹

1. I am a Special Agent with the United States Department of State ("State") and have been involved in the investigation of numerous cases involving passport and visa fraud. I am familiar with the facts and circumstances set forth below from my participation in the

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

investigation; my review of the investigative file, including the defendant's criminal history record; and from reports of other law enforcement officers involved in the investigation.

2. On or about November 4, 2022, MORRIS JABATEH arrived at John F. Kennedy International Airport on a flight from Morocco. Upon arrival JABATEH proceeded to the United States Customs screening and presented a United States passport in the name of another individual to a Customs and Border Patrol ("CBP") officer. An automated passport control kiosk took a photograph of JABATEH at the time he presented the United States passport for entry into the United States. The defendant's photograph triggered a facial recognition mismatch notification. Because of the facial mismatch, JABATEH was directed to secondary inspection.

3. At the secondary inspection, CBP officers conducted a search pursuant to their border search authority. CBP officers searched MORRIS JABATEH's wallet, which contained, among other things, two credit cards and a student identification card. One of the credit cards and the student identification card matched the name on the United States passport that JABATEH presented to the CBP officer. The other credit card bore a different name. The CBP officers fingerprinted JABATEH. His fingerprints matched those provided in connection with a visa application in the name of MORRIS JABATEH with a photograph that matched JABATEH. Additionally, upon searching JABATEH's cell phone, CBP officers uncovered a photograph of JABATEH's Liberian passport. The United States passport that JABATEH had used at United States Customs belonged to another individual and listed that person's name. JABATEH's cell phone also included photographs of the birth certificate, Social Security card and driver's license of the same individual whose United States passport JABATEH presented to the CBP officer.

WHEREFORE, your deponent respectfully requests that the defendant MORRIS JABATEH, be dealt with according to law.

/s/ *Alison Pierce*

ALISON PIERCE
Special Agent, United States Department of State

Sworn to before me this
5th day of November, 2022 Via Video



THE HONORABLE SANKET J. BULSARA
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK